

DAVID J. HARRIS, ESQUIRE  
COUNSEL FOR THE DEBTOR/Movant  
PA S. Ct. No.: 48558  
FL Bar No.: 0451207

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UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	Case No.: 5:19-bk-02155-RNO
KAVITA J. JAGTIANI a/k/a	:	Chapter 13
KA VITA SYED	:	
Debtor	:	
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KAVITA J. JAGTIANI a/k/a	:	
KA VITA SYED,	:	
	:	
Movant	:	
vs.	:	
CHARLES J. DeHART, III, ESQUIRE	:	
STANDING CHAPTER 13 TRUSTEE,	:	
LUZERNE COUNTY TAX CLAIM	:	
BUREAU, WELLS FARGO BANK, N.A.,	:	
ITRIA VENTURES, INC., SANTANDER	:	
BANK, N.A., FIRST NATIONAL BANK	:	
OF PENNSYLVANIA and ABID SYED,	:	
	:	
Respondents	:	

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CERTIFICATE OF NO OBJECTION

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I, David J. Harris, hereby certify as follows:

1. I filed a Motion to Sell Real Estate Free and Clear of Lines and Encumbrances Pursuant to 11 USC 363(f) on February 24, 2020 (“Motion”)(Doc. #65);
2. I served a copy of the Motion, this Court’s Order docketed at Doc. #66, and a proposed Order to approve the underlying sale free and clear on each of the

Respondents in the manner that complies with Fed. R. Bankr. P. 7004, as set forth in a Certificate of Service filed with the Court on February 25, 2020 (Doc. #69);

3. I served a Notice of the Sale on all creditors and parties in interest on February 24, 2020, as set forth in a Certificate of Service filed with the Court on February 25, 2020 (See, Doc #68);
4. The deadline date for the Respondents to file an answer, or to object, to the Motion and for all creditors and parties in interest to object to the sale was March 16, 2020;
5. The sole objector to the sale was the Respondent, Wells Fargo Bank, N.A., who filed a limited objection requiring that it, as first mortgage holder, be paid in full from the proceeds of the sale (Doc. #71);
6. The Movant agreed to the condition of Wells Fargo Bank, N.A. and filed a revised proposed Order relief on March 19, 2020 (Doc. #72);
7. Shortly following Movant's filing the revised proposed Order on March 19, 2020, Wells Fargo Bank, N.A. withdrew its limited objection (Doc. #73); and
8. As the March 16, deadline has passed and no objections remain outstanding to the Motion or the Notice, the relief sought by the Motion and as set forth in the Notice can be approved pursuant to the revised proposed Order on March 19, 2020 filed to Doc. #72.

I certify under penalty of perjury that the foregoing is true and correct.

RESPECTFULLY SUBMITTED:

Dated: March 20, 2020  
Wilkes-Barre, Pennsylvania

/s/ David J. Harris, Esquire  
DAVID J. HARRIS, ESQUIRE